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Attorneys for Individual Defendants Peter F. Van Camp,
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Renee F. Lanam, Peter T. Ferris, Brandi Galvin Morandi,
Scott Kriens, Louis J. Lavigne, Jr., and Gary Hromadko,
and Nominal Defendant Equinix, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JOHN DROSKOKSKI, Derivatively on Behalf
of EQUINIX, INC.,

Plaintiff,

v.

PETER F. VAN CAMP, KEITH D. TAYLOR,
SUSHIL KAPOOR, MARJORIE S.
BACKAUS, RENEE F. LANAM, PETER T.
FERRIS, BRANDI GALVIN MORANDI,
PHILIP J. KOEN, SCOTT KRIENS, LOUIS J.
LAVIGNE, JR., STEVEN T. CLONTZ,
STEVEN P. ENG, and GARY HROMADKO,

Defendants,

- and -

EQUINIX, INC., a Delaware Corporation,
Nominal Defendant.

Case No. C 06-6421-JSW

**STIPULATION AND [PROPOSED]
ORDER REGARDING BRIEFING
SCHEDULE**

1 This Stipulation is entered into by and among plaintiff John Droskokski ("Plaintiff"),
2 individual defendants Peter F. Van Camp, Keith D. Taylor, Sushil Kapoor, Marjorie S. Backaus,
3 Renee F. Lanam, Peter T. Ferris, Brandi Galvin Morandi, Scott Kriens, Louis J. Lavigne, Jr., and
4 Gary Hromadko, and nominal defendant Equinix, Inc. (collectively, "Defendants").

5 WHEREAS, Plaintiff has filed the above-captioned action in this Court alleging certain
6 violations of the federal securities and state laws ("Federal Action");

7 WHEREAS, Plaintiff purports to have properly served all of the defendants named in the
8 Federal Action except for Philip J. Koen, Steven T. Clontz, and Steven P. Eng;

9 WHEREAS, Defendants dispute the propriety of the purported service on certain of the
10 defendants named in the Federal Action; and

11 WHEREAS, by this stipulation, the parties intend to set a uniform date for Defendants to
12 respond to the complaint in the Federal Action;

13 IT IS HEREBY STIPULATED, pursuant to Northern District of California Civil Local
14 Rule 6-1, by and between the undersigned counsel for the parties that:

15 1. Defendants Peter F. Van Camp, Keith D. Taylor, Sushil Kapoor, Marjorie S.
16 Backaus, Renee F. Lanam, Peter T. Ferris, Brandi Galvin Morandi, Scott Kriens, Louis J.
17 Lavigne, Jr., and Gary Hromadko, and Nominal Defendant Equinix, Inc. shall file a motion to
18 dismiss or other response to the complaint in the above-captioned action no later than sixty (60)
19 days after the date of entry of this Order;

20 2. If Defendants file any motion directed at the complaint in the above-captioned
21 action, opposition briefs shall be filed no later than forty-five (45) days after the filing of such
22 motions, and reply briefs shall be filed no later than thirty (30) days after the filing of such
23 oppositions; and

24 3. By entering into this Stipulation, Defendants do not waive any right to challenge
25 the sufficiency of the purported service on any of the defendants named in the above-captioned
26 action.

27 IT IS FURTHER STIPULATED, pursuant to Northern District of California Civil Local
28 Rule 6-1, by and between the undersigned counsel for the parties, that the parties may enter into

1 and submit a further appropriate stipulation amending this filing.

2 Dated: December 22, 2006

FENWICK & WEST LLP

3 By: _____/s/
4 Kalama M. Lui-Kwan

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10 Attorneys for Defendants Peter F. Van Camp,
11 Keith D. Taylor, Sushil Kapoor, Marjorie S.
12 Backaus, Renee F. Lanam, Peter T. Ferris,
13 Brandi Galvin Morandi, Scott Kriens, Louis J.
14 Lavigne, Jr., and Gary Hromadko, and
15 Nominal Defendant Equinix, Inc.

11 Dated: December 22, 2006

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS, LLP

12 By: _____/s/
13 Shawn A. Williams

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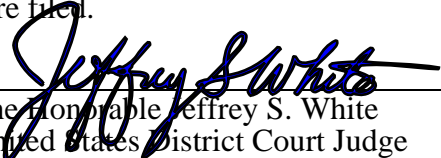
Attorneys for Plaintiff John Droskopski

18 Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, I
19 attest under penalty of perjury that concurrence in the filing of the document has been obtained
20 from Shawn A. Williams.

21 * * *

22 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.** Any motion shall be noticed
23 for hearing on a date not less than 21 days after the replies are filed.

24 DATED: January 3, 2007 2006

25 
26 The Honorable Jeffrey S. White
27 United States District Court Judge

26 25346/00402/LIT/1259367.2